

Joseph & Norinsberg LLC

Fighting for Employee Justice



Downtown Manhattan Office

One World Trade Center, 85th Floor
New York, NY 10007

Midtown Manhattan Office

110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office

One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office

1650 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103

Boston Office

225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office

300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Arjeta Albani, Esq.
arjeta@employeejustice.com

March 7, 2025

VIA ECF

Hon. Ronnie Abrams
United States Courthouse
40 Foley Square, Courtroom 1506
New York, New York 10007

Re: Turner v. Gnome Wellness LLC
1:24-cv-98283-RA

Dear Judge Abrams,

We represent Juan Igartua (“Plaintiff”) in the above referenced ADA matter against Defendant, Brecken Gold Athletics NYC LLC (“Defendant”) (collectively the “Parties”). Pursuant to the Court’s Order dated February 24, 2025, the parties were instructed to submit a joint letter to the Court by March 7, 2025. (Docket No. 8). Plaintiff has been unable to get in contact with Defendant in this matter and has commenced default judgment proceedings against Defendant, obtaining the Clerk’s Certificate of Default on February 24, 2024. (Docket No. 11).

Plaintiff intends to file the formal motion for default judgment against Defendant within the next two weeks.

Based on the foregoing, Plaintiff respectfully requests that the Court adjourn the deadline for a joint status letter sine die to allow Plaintiff to continue with the default judgment proceedings.

We thank the Court for its time and attention.

Respectfully submitted,

Arjeta Albani, Esq.